

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Z.A., an Infant, by and through his Parents
and Natural Guardians, CARMIT
ARCHIBALD and GEORGES
ARCHIBALD, and CARMIT ARCHIBALD,
individually,

Plaintiffs,

- against -

HYATT CORPORATION,

Defendant.

Docket No. 1:24-cv-03742

**DECLARATION OF
KATRINA LOVE**

KATRINA LOVE, declares as follows under the penalties of perjury:

1. I am above the age of 18 years old and of sound mind, and fully competent to testify to the statements made herein in a court of law. I am currently employed by Hyatt Hotels Corporation (“HHC”). I serve as an **Director of Global Claims** for HHC and have held this position for approximately **2 1/2** years. Based on my personal knowledge, if called upon to do so, I could and would testify to all facts set forth below.

2. Hyatt Hotels Corporation is incorporated under the laws of the State of Delaware and maintains its principle place of business in Chicago, Illinois. Hyatt Corporation’s corporate office is located at 150 North Riverside Plaza, Chicago, Illinois 60606.

3. The Park Hyatt St. Kitts (the “Resort”) is a resort complex located in St. Kitts and Nevis in the British West Indies.

4. I have been made aware of the instant lawsuit commenced by Plaintiff Z.A., by and through his Parents and Natural Guardians, CARMIT ARCHIBALD and GEORGES

ARCHIBALD, and CARMIT ARCHIBALD, (“Plaintiffs”) as a result of personal injuries allegedly sustained on April 8, 2023, at the pool of the Resort.

5. The Resort is operated by Hyatt Services Caribbean L.L.C., which is a Delaware Limited Liability Company and a separate legal entity from Hyatt Corporation.

6. Hyatt Services Caribbean, L.L.C., is a separate legal entity from Hyatt Hotels Corporation.

7. HHC is the parent corporation of Hyatt Corporation.

8. HHC does not have any operational responsibility or direct ownership interest in the Park Hyatt St. Kitts property, or any portion of the facilities that comprise the Resort.

9. HHC does not have a partnership or joint venture with the Resort.

10. HHC does not own, maintain or have control over the Resort or any of its facilities, including the pool area of the Resort, and is not involved in the Resort’s operations directly nor indirectly.

11. HHC is not a party to any contract with either codefendant or any other entity for the management or operation of the Hotel or the Water Park.

12. The claims asserted by Plaintiffs do not involve Hyatt Hotels Corporation’s operations and/or business contacts in New York to the extent any might exist.

13. HHC is not authorized to do business in the State of New York.

14. HHC has never commenced any lawsuit in the State of New York related to Plaintiffs’ stay at the Resort, the incident in the pool area of the Resort, or any of Plaintiffs’ claims asserted in this lawsuit.

15. HHC has not generated any revenue in the State of New York related to Plaintiffs or their claims.

16 HHC representatives did not travel to the State of New York to conduct any business transactions related to Plaintiffs or their claims.

17 HHC has no employees in any location including in the State of New York nor in the British West Indies.

18 HHC has no accounts in the State of New York nor in the British West Indies.

19 HHC has no real property in the State of New York nor in the British West Indies.

20 HHC has no personal property in the State of New York nor in the British West Indies.

21 HHC has never filed a tax return in the State of New York nor in the British West Indies.

Dated: September 12, 2024

Sworn to before me this
12 day of September, 2024

Nancy Almanza
Notary Public

Katrina Love

Katrina Love

